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UNITES STATES DISTRICT COURT

DISTRICT of NEVADA

MARLAND JACKSON, MOTHER (WILMA
BANKS) ON BEHALF OF HIS ESTATE AND
CHILDREN (UNIQUE JACKSON,
DEVONTA ELLIS JACKSON, AND
KEAIRRA WASHINGTON),

Plaintiffs,

vs.

STATE OF NEVADA, THE DEPARTMENT
OF CORRECTIONS, PRISON
ADMINISTRATION, GUARDS, AND CASE
WORKERS,

Defendants.

Case No: 2:23-cv-02015-CDS-BNW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANT TIFFANY BROWN
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

[FIRST REQUEST]

Plaintiff Marland Jackson, Mother (Wilma Banks) ("Plaintiff") and Defendant Tiffany Brown ("Tiffany Brown"), by and through their respective counsel of record, hereby stipulate and agree as follows:

1. On March 7, 2024, the Court approved the Stipulation and Proposed Order to Amend Complaint between Plaintiff and Interested Party Nevada Department of Corrections. *See* ECF Doc. 7 ("Stipulation to Amend"). Under the Stipulation to Amend, Plaintiff has sixty (60) days, until May 6, 2024, to file an Amended Complaint. *See id.*

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2. If Plaintiff names Tiffany Brown as a defendant in an Amended Complaint submitted pursuant to the Stipulation to Amend (ECF Doc. 7), then Ms. Brown will file a response to the Amended Complaint within twenty-one (21) days of its filing.

3. If Plaintiff does not file an Amended Complaint on or before May 6, 2024, pursuant to EFC Doc. 7, then Tiffany Brown shall have twenty-one days, until May 27, 2024, to respond to Plaintiff's Complaint (ECF Doc. 1).

By entering this stipulation, neither party waives any rights or defenses they have under statute, law, or rule with respect to Plaintiff's complaint.

DATED this 12th day of March, 2024.

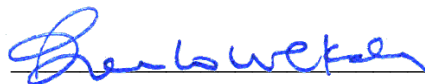
DATED this 12th day of March, 2024.

By: /s/ C. Benjamin Scroggins
C. BENJAMIN SCROGGINS
Attorney for Plaintiff

By: /s/ Sherry Ly Rose
SHERRY LY ROSE
Deputy District Attorney
Attorneys for Defendant Tiffany Brown

ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE,

DATED: 3/13/2024

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that I am an employee of the Office of the Clark County District Attorney and that on this 12th day of March, 2024, I served a true and correct copy of the foregoing STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR DEFENDANT TIFFANY BROWN TO RESPOND TO PLAINTIFF'S COMPLAINT (United States District Court Pacer System or the Eighth Judicial District Wiznet), by e-mailing the same to the following recipients. Service of the foregoing document by e-mail is in place of service via the United States Postal Service.

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